

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

ERICA LAYTON, SAMUEL LAYTON : CIVIL ACTION NO. 13-CV-1634
AND GERALD BUNTYN, JR.

VERSUS : JUDGE HICKS

CHEVRON ENVIRONMENTAL : MAGISTRATE JUDGE HORNSBY
MANAGEMENT COMPANY and
CONESTOGA-ROVERS & ASSOCIATES,
INC.

PLAINTIFFS' MOTION FOR EXTENSION OF TIME

NOW INTO COURT, through undersigned counsel, come the plaintiffs, ERICA LAYTON, SAMUEL LAYTON and GERALD BUNTYN, JR., who respectfully requests that the Court grant a five (5) day extension within which to file their memorandum in opposition to the defendants' Joint Motion for Summary Judgment Regarding Prescription for the following reasons:

1.

Counsel for plaintiffs are currently in a two-week trial before Honorable Penelope Richard in the matter entitled *Mark Clark, et al v. BP America, Inc., et al*, Docket No. 18,866, 38th Judicial District Court, Cameron Parish, Louisiana.

2.

Counsel for defendant Conestoga-Rovers Associates, Inc. has no objection to the extension. Counsel for defendant Chevron Environmental Management Company was contacted but undersigned counsel has not received a response.

Respectfully submitted:

/s/ J. Rock Palermo III
J. Rock Palermo III (#21793)
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Gerald Buntyn, Jr.

CERTIFICATE OF SERVICE

I hereby certify that, on this 8th day of November, 2013, I caused the foregoing pleading to be served by electronic mail on all counsel of record.

/s/ J. Rock Palermo III
J. ROCK PALERMO III